

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:19-cv-00609-BAH**

JAMES MADISON PROJECT et al v. CENTRAL
INTELLIGENCE AGENCY et al
Assigned to: Chief Judge Beryl A. Howell
Cause: 05:552 Freedom of Information Act

Date Filed: 03/05/2019
Jury Demand: None
Nature of Suit: 895 Freedom of
Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff**JAMES MADISON PROJECT**

represented by **Mark Steven Zaid**
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Plaintiff**ADAM ENTOUS**

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V.

Defendant**CENTRAL INTELLIGENCE
AGENCY**

represented by **Jason Todd Cohen**
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Defendant**DEPARTMENT OF STATE**

represented by

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Defendant**DEPARTMENT OF JUSTICE**

represented by **Jason Todd Cohen**
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Defendant**DEPARTMENT OF DEFENSE**

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Defendant**DEPARTMENT OF COMMERCE**

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Defendant**U.S. AGENCY FOR
INTERNATIONAL DEVELOPMENT**

represented by **Jason Todd Cohen**
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Date Filed	#	Docket Text
03/05/2019	<u>1</u>	COMPLAINT against CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF COMMERCE, DEPARTMENT OF DEFENSE, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (Filing fee \$ 400 receipt number 0090-5981678) filed by ADAM ENTOUS, JAMES MADISON PROJECT. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit Rule 7.1 certification, # <u>3</u> Summons CIA, # <u>4</u> Summons DOJ, # <u>5</u> Summons Commerce, # <u>6</u> Summons State, # <u>7</u> Summons DoD, # <u>8</u> Summons USADC, # <u>9</u> Summons USAG, # <u>10</u> Summons USAID)(Moss, Bradley) (Entered: 03/05/2019)
03/05/2019	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests. (zef,) (Entered: 03/05/2019)
03/05/2019		Case Assigned to Chief Judge Beryl A. Howell. (zef,) (Entered: 03/05/2019)
03/05/2019	<u>3</u>	SUMMONS (8) Issued Electronically as to CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF COMMERCE, DEPARTMENT OF DEFENSE, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT, U.S. Attorney and U.S. Attorney General. (Attachments: # <u>1</u> Notice and Consent)(zef,) (Entered: 03/05/2019)
03/05/2019	<u>4</u>	STANDING ORDER. Signed by Chief Judge Beryl A. Howell on March 5, 2019. (lcbah2) (Entered: 03/05/2019)
03/13/2019	<u>5</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. CENTRAL INTELLIGENCE AGENCY served on 3/11/2019 (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)
03/13/2019	<u>6</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF DEFENSE served on 3/11/2019 (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)

03/13/2019	<u>7</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF STATE served on 3/11/2019 (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)
03/13/2019	<u>8</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed. DEPARTMENT OF JUSTICE served on 3/11/2019 (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)
03/13/2019	<u>9</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed on United States Attorney General. Date of Service Upon United States Attorney General 03/11/2019. (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)
03/13/2019	<u>10</u>	RETURN OF SERVICE/AFFIDAVIT of Summons and Complaint Executed as to the United States Attorney. Date of Service Upon United States Attorney on 3/11/2019. Answer due for ALL FEDERAL DEFENDANTS by 4/10/2019. (Attachments: # <u>1</u> Exhibit proof of service)(Moss, Bradley) (Entered: 03/13/2019)
04/05/2019	<u>11</u>	NOTICE of Appearance by Jason Todd Cohen on behalf of All Defendants (Cohen, Jason) (Entered: 04/05/2019)
04/05/2019	<u>12</u>	MOTION for Extension of Time to File Answer re <u>1</u> Complaint,, by CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF COMMERCE, DEPARTMENT OF DEFENSE, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT (Cohen, Jason) (Entered: 04/05/2019)
04/09/2019		MINUTE ORDER (paperless) GRANTING the defendants' <u>12</u> Motion for Extension of Time to Answer or Otherwise Respond to Complaint and DIRECTING the defendants to respond by May 10, 2019. Signed by Chief Judge Beryl A. Howell on April 9, 2019. (lcbah2) (Entered: 04/09/2019)
04/09/2019		Set/Reset Deadlines: Answer to the Complaint due by 5/10/2019. (tg) (Entered: 04/09/2019)
04/23/2019	<u>13</u>	NOTICE of Appearance by Mark Steven Zaid on behalf of All Plaintiffs (Zaid, Mark) (Entered: 04/23/2019)
05/10/2019	<u>14</u>	ANSWER to Complaint by CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF COMMERCE, DEPARTMENT OF DEFENSE, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT.(Cohen, Jason) (Entered: 05/10/2019)
05/14/2019	<u>15</u>	MOTION for Leave to File <i>an Amended Complaint</i> by ADAM ENTOUS, JAMES MADISON PROJECT (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Exhibit A – First Amended Complaint, # <u>3</u> Text of Proposed Order)(Moss, Bradley) (Entered: 05/14/2019)
06/03/2019		MINUTE ORDER (paperless) GRANTING the plaintiffs' <u>15</u> Motion for Leave to File Amended Complaint, which the government does not oppose. Signed by Chief Judge Beryl A. Howell on June 3, 2019. (lcbah2) (Entered: 06/03/2019)
06/03/2019	<u>16</u>	AMENDED COMPLAINT against CENTRAL INTELLIGENCE AGENCY, DEPARTMENT OF COMMERCE, DEPARTMENT OF DEFENSE, DEPARTMENT OF JUSTICE, DEPARTMENT OF STATE, U.S. AGENCY FOR INTERNATIONAL DEVELOPMENT filed by ADAM ENTOUS, JAMES MADISON PROJECT.(zrdj) (Entered: 06/18/2019)
09/05/2019		MINUTE ORDER (paperless) TO SHOW CAUSE why this action should not be dismissed for failure to prosecute pursuant to Local Civil Rule 83.23. The amended complaint was docketed in June 2019 but no answer or response has been timely filed. Accordingly, the plaintiff is ORDERED to submit, by September 12, 2019, (1) a full explanation of why counsel for the parties have not jointly prepared and submitted a Meet and Confer Report to the Court, as required by the <u>4</u> Standing Order and (2) a full explanation of why this action should not be dismissed for failure to prosecute. If it is determined that the plaintiff has not shown good cause for failure to prosecute, the case will be dismissed pursuant to Local Civil Rule 83.23. Signed by Chief Judge Beryl A. Howell on September 5, 2019. (lcbah2) (Entered: 09/05/2019)